

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTON PERAIRE-BUENO, and JAMES
PERAIRE-BUENO,

Defendants.

Case No.: 1:24-cr-00293-JGLC

ORAL ARGUMENT REQUESTED

**DEFENDANTS' NOTICE OF JOINT MOTION
TO SUPPRESS OR, ALTERNATIVELY, FOR *FRANKS* HEARING**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and materials cited therein, Defendants Anton Peraire-Bueno and James Peraire-Bueno will jointly move this Court before the Honorable Jessica G.L. Clarke, in Room 11B of the United States District Court, 500 Pearl Street, New York, New York, 10007, for an order suppressing all evidence that the government obtained from Google, LLC via search warrants, and all fruits of those poisonous trees, or alternatively, for an evidentiary hearing pursuant to *Franks v. Delaware*, 438 U.S. 154 (1978).

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's August 22, 2024 Order (ECF 39), opposition papers, if any, shall be served by January 17, 2024, and reply papers, if any, shall be served by January 31, 2025.

The Peraire-Buenos respectfully request oral argument on this motion.

Date: December 6, 2024

Respectfully submitted,

By: /s/ Katherine Trefz

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Anton Peraire-Bueno

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record in this matter who are on the CM/ECF system.

/s/ *Katherine Trefz*
Katherine Trefz